

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, et al.,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 19 C 3678
)	
CALACCI CONSTRUCTION CO., INC.,)	JUDGE ROBERT M. DOW, JR.
an Iowa corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on October 4, 2019, request this Court enter judgment against Defendant, CALACCI CONSTRUCTION CO., INC., an Iowa corporation. In support of this Motion, Plaintiffs state:

1. On October 4, 2019, this Court entered default against Defendant and granted Plaintiffs' request for an order directing Defendant to turn over its monthly fringe benefit contribution reports for the time period June 2019 forward. The Court also entered an order that judgment would be entered after Plaintiffs' received the required contribution reports and determined the amounts due and owing from Defendant.

2. On or about October 17, 2019, Plaintiffs' counsel received Defendant's monthly fringe benefit contribution reports for the months of June 2019 and July 2019. These reports indicate Defendant is delinquent in contributions to the Funds in the amount of \$7,836.47. (See Affidavit of Paul E. Flasch).

3. Additionally, the amount of \$273.86 is due for liquidated damages. (Flasch Aff. Par. 6).

4. In addition, Plaintiffs' firm has expended \$438.95 for costs and \$2,375.00 for attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$10,924.28.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$10,924.28.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for the Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 27th day of November 2019:

Mr. John B. Calacci, Registered Agent
Calacci Construction Co., Inc.
2881 Independence Road
Iowa City, IA 52240-8171

/s/ Patrick N. Ryan

Patrick N. Ryan
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